
FINAL RECOMMENDATIONS FOR THE COMMITTEE ON DENTAL AUXILIARIES

RECOMMENDATIONS OF THE JOINT SUNSET REVIEW COMMITTEE AND THE DEPARTMENT OF CONSUMER AFFAIRS

ISSUE #1. (CONTINUE REGULATION OF THE PROFESSION?)

Should the licensing and regulation of dental auxiliaries be continued?

Recommendation #1: *The Joint Committee and the Department recommend the continued regulation of dental auxiliaries.*

Comments: Dental care at all levels affects the health and safety of Californians and requires a high level of skill.

ISSUE #2. (CHANGE STATUS OF THE COMDA AS A COMMITTEE OF THE DENTAL BOARD?)

Should there be a change in the COMDA's status as a statutorily-created committee of the Dental Board with specified, independent authority regarding dental auxiliary examinations and licensing?

Recommendation #2: *The Joint Committee recommends that the status of the COMDA as a statutorily-created committee of the Dental Board should not be changed given the proposed actions to change the Dental Board structure and regulatory authority over dental auxiliary practice.*

If changes are not made to improve the Dental Board's representation of the public's interests and those of dental auxiliaries, then consideration should be given to making the COMDA into an independent licensing agency for dental auxiliaries.

Comments: Sunsetting and reconstitution of the Dental Board, with possible changes in its representation of the public and the licensed dental professions have been recommended in the report on the Dental Board. The purpose of those recommended changes is to improve the Board's administration to better reflect the needs of the public and all of the licensed dental professions. If that approach is not taken or is unsuccessful, an alternative approach could be to separate the licensure of dentists from dental auxiliaries by making the COMDA into an independent licensing agency for dental auxiliaries. The number of dental licensees could probably sustain two separate licensing agencies – with proposed changes in statutorily-

established scopes of practices for each category of licensee requiring legislative enactment, as is the case for other licensed professions.

ISSUE #3. (BASE SCOPE OF PRACTICE FOR DENTAL AUXILIARIES ON GENERAL SCOPE OF DUTIES?)

Should the scopes of practice for the various categories of dental auxiliaries be restructured so that they are based on a general range of duties rather than requiring regulatory approval for each specific procedure or use of a particular product?

Recommendation #3: The Joint Committee and the Department recommend that a more structured framework be applied in defining the scope of practice for dental auxiliaries and that the scope of practice be based on a general range of duties.

Comments: Currently, the COMDA and the Board tend to regulate by function and product which is restrictive and fails to provide the flexibility to train and allow dental assistants and hygienists to perform new functions. In addition, limiting the practice of dental auxiliaries by function and product requires the COMDA to continually update their existing laws and regulations to conform to the standard of practice as it evolves.

The COMDA indicates that the Board has rejected several recommendations to expand the scope of practice for dental auxiliaries. Many of these recommendations were based on duties that dental auxiliaries are educated and trained to perform in a competent manner. In fact, some of the recommended changes were based on extensive occupational analyses performed on RDHs and RDHEFs.

In addition, the profession has expressed concerns that certain procedures that have been authorized for one classification are being delegated to unlicensed dental assistants or other classifications that are not authorized to perform those duties.

ISSUE #4. (INCREASE EDUCATION REQUIREMENTS IN RADIATION SAFETY AND CORONAL POLISHING?)

Should education requirements for radiation safety and coronal polishing be increased for new applicants & existing RDAs?

Recommendation #4: The Board and the COMDA believe that all RDAs and new RDA applicants should be required to complete approved courses in radiation safety and coronal polishing to ensure consumer protection. The Joint Committee and the Department agree with the COMDA that the health, safety, and welfare of the public may be at risk by allowing RDAs to perform these functions without appropriate instruction and certification.

Comments: According to the COMDA, radiation safety courses are approximately 36 to 40 hours in length and cost about \$175, and coronal polishing courses are approximately 12 hours in length and cost about \$150. In addition, the COMDA estimates that approximately 63% of the current RDAs already possess a coronal polishing certificate. The number of radiation safety

certificates is unknown since these certificates are issued to unlicensed dental assistants as well as RDAs.

The COMDA indicates that the Board is in support of this concept. In fact, at the Board's February 2001 meeting, the Board approved proposed legislation submitted for review by the COMDA to address this issue.

ISSUE #5. (INCREASE THE PAY LEVELS (PER DIEM) OF THE EXAMINERS FOR THE REGISTERED DENTAL HYGIENIST (RDH) EXAM AND THE DENTAL LICENSING EXAM?)

Should pay levels be increased in order to attract and retain qualified personnel?

Recommendation #5: *The Joint Committee recommends that the COMDA support the statutory changes proposed in SB 724 (B&P Committee) that will repeal the current per diem limitation on license examiners and add new statutory criteria for license examiners appointed by the Dental Board to administer the various dental license examinations.*

Comments: Currently, Business and Professions Code Sections 1621.6 specifies that examiners who perform as examiners for the dental licensure exam and the Registered Dental Hygienist (RDH) examination are to receive the same per diem as is currently specified by Business and Professions Code Section 103 for all members of every license board, commission or committee created within the Department of Consumer Affairs (including the Dental Board and the COMDA members). That amount is currently specified to be \$100 per day. The COMDA states that other examiners it employs to grade the Extended Function (EF) and Registered Dental Assistant (RDA) Licensing exams are not subject to this same limitation, nor are other examiners for other licensing boards within the department. The COMDA states that the current limitation has begun to unduly affect its ability to recruit exam graders who often have to work 10-12 hour exam weekends in addition to their normal work week. The COMDA states that to pay the examiners in question a more appropriate amount (unspecified) would cost a total of approximately \$70,000 annually.

ISSUE #6. (REDUCE THE WORK EXPERIENCE REQUIREMENT FOR THE ON-THE-JOB TRAINING TRACK TO BECOMING AN RDA?) Should the work experience be reduced from 18 to 12 months so that it will more closely match the 8 month time commitment for the alternative track that requires an applicant to successfully complete a Dental Board-approved educational program of approximately 8 months duration?

Recommendation #6: *The Joint Committee recommends that the on-the-job training experience requirement for becoming a registered dental assistant (RDA) should be reduced as proposed by the COMDA from 18 months to 12 months – via any necessary amendment to the current statutory limits.*

Comments: Currently, applicants for the Registered Dental Assistant (RDA) license must either complete a Dental Board-approved educational program of approximately 8 months duration or have 18 months of qualifying work experience with a licensed dentist in the United States. The COMDA states that it and the Dental Board believe that only 12 months of work experience rather than 18 months would provide a more equitable time commitment between the two tracks for RDA license qualification and provide sufficient experience for that qualification.

ISSUE #7. (DELETE CURRENT MEETING LOCATION REQUIREMENT?)
Should the current requirement that COMDA hold at least one meeting a year in Sacramento and one in Los Angeles be eliminated, so that THE COMDA's meeting schedule can coincide with that of the Dental Board?

Recommendation #7: *Amend the statute to delete the location requirements.*

Comments: The COMDA is required by statute, Business and Professions Code Section 1749, to meet at least four times annually, and hold at least one meeting per year in Sacramento and one in Los Angeles. The reason for the meeting location requirements is unknown. The COMDA indicates that these location requirements place an unwieldy restriction on its attempt to coordinate its meetings with the Dental Board, in its efforts to increase communication between the two agencies.